

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

IN RE:  
GEO EXPLORATION, LLC.,

Debtor.

Case No. 09-14024 13A 10/26/09  
Chapter 7

**MOTION FOR RULE  
2004 EXAMINATION**

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Jerry Parent ('Parent'), an unlisted creditor of the debtor, files this motion for a Rule 2004 examination of Kris K. Agrawal ('Agrawal'), 4133 N. Lincoln Blvd., Okla. City, OK 73105, and in support states:

1. The above referenced Debtor filed a Voluntary Petition under Chapter 7 of the United States Bankruptcy Code on July 27, 2009.

2. Parent is also Managing Member of Spoon Resources, LLC. ('Spoon'), which has a judgment against Debtor and Agrawal and other entities related to Debtor and to Agrawal in CJ-08-1209, Okmulgee County District Court, Oklahoma, which judgment filed April 3, 2009, declared that the Debtor and Agrawal "acting in concert and conspiracy, knowingly and willfully filed a false lien notice and disparaged Spoon's title in the Lease", referring to the subject Wilson oil and gas lease. Agrawal neglected to list Spoon or Parent as creditors in this matter.

3. Agrawal as the corporate representative of Debtor appeared at the §341 hearing on August 25, 2009, but was uncooperative with the assigned Trustee, Win Holbrook, and was ordered to appear at a continuance on Wednesday, October 21, 2009, at 0900 but failed to appear greatly inconveniencing the Trustee, Parent and several other creditors who had driven from as far away as the Oklahoma panhandle. Trustee Holbrook supports this motion for a Rule 2004 hearing.

4. Debtor and Agrawal should also produce the following relevant documents:

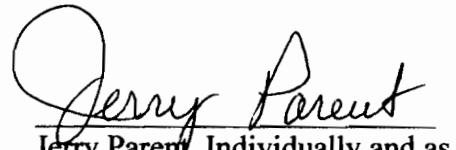
a. All documents previously requested by Trustee Holbrook and U.S. Attorney Glidewell at the first §341 hearing as specifically stated in the official recording thereof, said documents to be delivered at the continuance on October 21, 2009, which Debtor and Agrawal contemptuously failed, neglected and refused to attend, and,

b. All documents tending to support debtor's claims against Spoon

Resources, LLC. in general and debtor's lien notice in particular filed in Book 1963 at Page 255 with the County Clerk of Okmulgee County, Oklahoma.

**5.** Rule 2004 of the Federal Rules of Bankruptcy Procedure provides, *inter alia*, that, on motion, the court may order the examination of any person, and the person may be compelled to produce documents.

WHEREFORE, Jerry Parent, Creditor, for himself and for Spoon, requests the Court issue its order directing Kris Agrawal to attend a Rule 2004 examination at 1000 A.M., on November 23, 2009, in the offices of Delluomo and Crow at 5617 N. Classen Blvd., Okla. City, OK 73118 and produce the documents above requested.



Jerry Parent  
Jerry Parent, Individually and as  
Managing Member of Spoon.  
102 W. Polk St.  
McAlester, OK 74501  
Ph: 405.474.7455

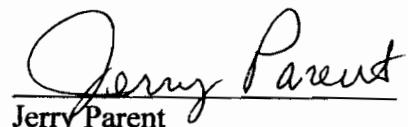
**CERTIFICATE OF SERVICE**

I hereby certify that on October 26, 2009, a copy of this Motion was served via first class mail, postage prepaid, to:

Geo Exploration, LLC  
Kris Agrawal  
4133 N. Lincoln Blvd  
Oklahoma City, OK 73105

Win Holbrook, Esq.  
100 N. Broadway, Suite 3300  
Oklahoma City, OK 73102

All others on the case mailing matrix as  
required. *VIA U.S. MAIL*



Jerry Parent  
Jerry Parent

Jasen Cox  
P.O.B. 171  
Newcastle, OK 73065-0171

Jason Green  
912 S. Taft Street  
Tulsa, OK 74147

John Lewis Well Service  
P.O.B. 67  
Sasakwa, OK 74867-0067

Josh Davis  
35986 E. Hwy 270  
Seminole, OK 74868-6908

Justin Holland  
3513 Oak Cliff Drive  
Oklahoma City, OK 73135-1319

Kris Agrawal  
4133 N. Lincoln Blvd.  
Oklahoma City, OK 73105-5208

LJWS Rental Tool & Trucking  
P.O.B. 1025  
Perryton, TX 79070-1025

Lively Electric  
Hwy 270B N  
Newkula, OK 74884

Mike Walker  
3400 S.E. 27th Street  
Del City, OK 73115-1618

Mills Well Service  
P.O.B. 871  
Seminole, OK 74818-0871

Nichols Water Services  
c/o Jerry Venables  
P.O.B. 340  
Beaver, OK 73932-0340

O.K. Cementing  
c/o James Neal  
P.O.B. 1628  
Ada, OK 74821-1628

OG&E  
Box 24990  
Oklahoma City, OK 73124-0990

Oklahoma Corporation Commission  
2101 N. Lincoln Blvd.  
Oklahoma City, OK 73105-4993

Perkins Petroleum  
P.O.B. 1078  
Guymon, OK 73942-1078

Rawhide Well Service  
P.O.B. 1988  
Cody, WY 82414-1988

Ray Vincent  
430 N.W. 11th Street  
Oklahoma City, OK 73103-3914

Ricardo Polio  
3485 East 41st  
Oklahoma City, OK 73129

Sulphur Well Services  
3838 Oak Lawn Ave.  
Ste. 910  
Dallas, TX 75219-4510

Victor Grider  
701 N.W. 13th Street  
Oklahoma City, OK 73103-2206

David M. Roberts  
Affiliated Legal Services, Inc.  
4200 Perimeter Center, Suite 245  
Oklahoma City, OK 73112-2322

Herbert M. Graves  
United States Trustee  
215 Dean A. McGee Ave., 4th Floor  
Oklahoma City, OK 73102-3440

L. Win Holbrook  
Andrews Davis  
100 North Broadway Suite 3300  
Oklahoma City, OK 73102-8812

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) J & L Cementing Service  
c/o John Coffey  
1001 N.W. 63rd Street

End of Label Matrix	
Mailable recipients	52
Bypassed recipients	1
Total	53

Label Matrix for local noticing

1087-5

Case 09-14024

Western District of Oklahoma

Oklahoma City

Fri Sep 18 15:07:48 CDT 2009

USBC Western District of Oklahoma

215 Dean A. McGee

Oklahoma City, OK 73102-3440

Geo Exploration, LLC

4133 N. Lincoln Blvd.

Oklahoma City, OK 73105-5208

Great White Pressure Pumping, LLC

4500 S.E. 59th Street

Oklahoma City, OK 73135-3326

A & J Acid Inc.

P.O.B. 758

Blackwell, OK 74631-0758

Bill Henson Pulling Unit

8931 South Erie

Tulsa, OK 74137-3546

Blowout Tools

P.O.B. 96058

Oklahoma City, OK 73143-6058

Bostic Services

P.O.B. 536

Crescent, OK 73028-0536

Burleson Pump Company

21207 S. Prospect

Oklahoma City, OK 73129

CF Supply LLC

P.O.B. 1385

Liberal, KS 67905-1385

Case Wire Line

P.O.B. 646

Woodward, OK 73802-0646

Christopher Holland

8810 N. Henley

Oklahoma City, OK 73131-4006

City of Oklahoma City

P.O.B. 26570

Oklahoma City, OK 73126-0570

DCP Minerals

6120 S. Yale, Ste. 1100

Tulsa, OK 74136-4200

DJF Services, Inc.

P.O.B. 150

Holdenville, OK 74848-0150

Dustin Pannell

C/O Oklahoma Depart of Labor Legal Divis

3017 N. Stiles

Oklahoma City, OK 73105-2811

Eagle Well Service

d/b/a Bronco Energy Services

6601 S.W. 29th Street

Oklahoma City, OK 73179-6004

F & F Tool Company

c/o Michael Bigheart

202 W. Broadway

Enid, OK 73701-4048

Fesco, Ltd

c/o Susan Meinders

2201 S. Main Street

Hope, AR 71801

Foster Testing Co.

P.O.B. 728

Perryton, TX 79070-0728

General Holdind Corporation

4133 N. Lincoln Blvd.

Oklahoma City, OK 73105-5208

General, Inc.

P.O.B. 504

Laverne, OK 73848-0504

Gilbert Ventura

348 S.E. 44th Street

Oklahoma City, OK 73129

Gore Nitrogen

P.O.B. 65

Sailing, OK 73663-0065

Harris Engine & Compressor Service

P.O.B. 2616

Liberal, KS 67905-2616

Hough Oil Field Service

P.O.B. 1603

Cushing, OK 74023-1603

Israel Harrison

35986 E. HWY 270

Seminole, OK 74868-6908

J & R Service

P.O.B. 781

Woodward, OK 73802-0781

JACAM Chemicals LLC

205 S. Broadway

Sterling, KS 67579-2339

Jack's Flex Pipe

P.O.B. 71

Konawa, OK 74849-0071